

MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

ELKAN ABRAMOWITZ  
RICHARD F. ALBERT  
ROBERT J. ANELLO\*  
KATHLEEN E. CASSIDY  
BENJAMIN S. FISCHER  
CATHERINE M. FOTI  
CHRISTOPHER B. HARWOOD  
LAWRENCE IASON  
BRIAN A. JACOBS  
TELEMACHUS P. KASULIS  
KAREN R. KING  
THOMAS A. MCKAY  
ROBERT M. RADICK\*  
JONATHAN S. SACK\*\*  
EDWARD M. SPIRO  
JEREMY H. TEMKIN  
RICHARD D. WEINBERG

565 FIFTH AVENUE  
NEW YORK, NEW YORK 10017  
(212) 856-9600  
FAX: (212) 856-9494

[www.maglaw.com](http://www.maglaw.com)

WRITER'S CONTACT INFORMATION

[espiro@maglaw.com](mailto:espiro@maglaw.com)  
(212) 800-9460

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SENIOR COUNSEL  
PAUL R. GRAND  
COUNSEL  
JASMINE JUTEAU

ROBERT G. MORVILLO  
1938-2011  
MICHAEL C. SILBERBERG  
1940-2002  
JOHN J. TIGUE, JR.  
1939-2009

\*ALSO ADMITTED IN WASHINGTON, D.C.  
\*\*ALSO ADMITTED IN CONNECTICUT

**VIA ECF & EMAIL**

Honorable Analisa Torres  
U.S. District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 2210  
New York, New York 10007-1312

Re: *Doe v. Portnow, et al.*, 24 Civ. 345 (AT)

Dear Judge Torres:

We are attorneys for Defendant Neil Portnow in the above-referenced action and, as set forth in the letter filed today by Defendant National Academy of Recording Arts & Sciences, Inc. (Dkt. #40), write to respectfully ask this Court to allow us time to further review Plaintiff's Request for Voluntary Dismissal Without Prejudice (Dkt. #37). Specifically, we request that the Court allow us until Tuesday, May 14, 2024, to provide Mr. Portnow's position with respect to Plaintiff's request and that the Court take no action regarding that application prior to that date.

Furthermore, we respectfully request that the Court stay the pending deadlines in the interim, specifically, Mr. Portnow's May 9, 2024 deadline to answer the Amended Complaint and the parties' May 13, 2024 deadline to file a joint letter, proposed case management plan, and indication of whether they consent to proceed before a magistrate judge.

Thank you for Your Honor's consideration in this matter.

Respectfully yours,

*Edward M. Spiro*

Edward M. Spiro  
Catherine M. Foti  
Abbe R. Ben-David

cc: All counsel (by ECF)